Remarks

This response is in reply to an office action that was mailed on February 9, 2006.

In the office action, the examiner rejected claims 1-8, 10-17 as being rendered obvious by Tappel in view of Suzuki et al. Claim 9 was objected to. The applicant respectfully transverses the rejection.

The applicant has amended the claims to describe how the "dispersion unit" operates, confirmed the location of the respective conduits that extend from respective dispersion units. The antecedent basis for these amendments can be found in numerous places throughout the specification and in particular the figures, page 2: "control unit 220, as illustrated in Figure 2, has a plurality of input keys 221 interconnected to at least a microprocessor 222. That microprocessor 222 is at least interconnected to pumps, fans, valves and/or switches 223 that push, pull and/or allow (by potential energy contained in the bladder(s)) a fluid through the conduits 230 and the bladder(s) 210." and page 4: "The control system 229 merely incorporates the input system 221 and the microprocessor unit 222 of the conventional control unit 220. Except in the present system 10, the control system 229 transmits its signals that control the units 223a,b through respective transmission lines 228a,b."

The applicant has also clearly identified that the first conduits and the first dispersion unit are only in either the head or foot section, not both sections, of the mattress while the second conduits and the second dispersion unit are in the opposite section of the mattress. The conduits do not pass the boundary between the head section and the foot section. **No cited reference discloses, teaches or suggests this embodiment for a self-contained mattress in a conversion mattress.** Those two sections are known to those of ordinary skill in the art for a conversion mattress.

Conduits and dispersion units operate differently – conduits merely transport a fluid from one point to another point, while the claimed dispersion unit operates in conjunction with the electrical signals (instructions) and fans or pumps from the control system and have fans or pumps that push or pull the fluid into the dispersion unit. The antecedent basis for this language is identified above.

The present invention uses electrical signals to communicate between the two different sections (foot and head) of the mattress. No cited reference disclose using such an electrical system in conjunction with the first dispersion unit and corresponding first conduits exclusively in the section of the mattress without the control system and the second dispersion unit and corresponding second conduits exclusively in the section of the mattress with the control system.

Tappel discloses a NON-CONVERSION, self-contained mattress. A Non-Conversion mattress has at least one mattress surface remain in a single plane, and has no notches in the mattress (as present in conversion mattresses) that allow the mattress to convert into a chair like conformation from a horizontal mattress, as claimed. Those notches are known to those in ordinary skill in the art to kink fluid hoses that protrude from one end of the bed to the other. The present invention avoids kinking by using an electrical signal through transmission lines and using fluid conduits only in particular sections. Tappel can have its conduits stretch the entire length of the mattress. The length of those conduits through kinks in the mattress would subject the present invention to kinking if the Tappel mattress was ever converted to a conversion

mattress. In other words, Tappel fails to disclose a conversion mattress as claimed.

Tappel also discloses a single dispersion unit (manifold and valves) in the foot section of the mattress and no where else in the mattress. That is not claimed in the present invention.

The claimed invention calls for a conversion, self-contained mattress. Tappel does not disclose such a mattress. The use of a single dispersion unit (a manifold and valves) does not allow Tappel's mattress to be a self-contained conversion mattress because the fluid conduits that extend from the single dispersion unit will be kinked if it is ever converted to a conversion mattress. Moreover, contrary to the claimed invention Tappel has the conduits (or dispersion units as defined by the examiner) extend from one end of the mattress to the other end. That disclosure teaches away from the claimed invention.

The examiner identifies item 113 as a dispersion unit. At column 5, lines 9-10; Tappel unequivocally identifies item 113 as an "L-shaped tube." Tubes are conduits (see Merriam-Webster's Online dictionary and thesaurus that confirms conduits, pipes and tubes are synonymous). Pursuant to the claim language, a dispersion unit is not and is never just a conduit and/or tube, it also contains a fan or pump that pushes or pulls the fluid into the dispersion unit which is distinct from a conduit as defined by the examiner. Accordingly, the examiner's broad interpretation to define a mere tube device as a dispersion unit is improper in view of the claims as written.

There is also not one teaching, disclosure or suggestion that Tappel's mattress can ever be used as a conversion mattress as claimed. No where does Tappel teach, suggest or disclose that his system can solve and/or address at least the kinking hose problem that is present with conventional conversion mattresses.

Suzuki et al. disclose a conventional NON-CONVERSION (the bottom surface remains in a single plane) mattress that converts, or able to convert, from a horizontal mattress to a chair conformation as claimed. Instead, Suzuki et al.'s mattress is able to be altered from a horizontal mattress to just an inclined mattress wherein the bottom surface remains in a single plane.– that is not a conversion mattress as claimed.

Suzuki discloses "An air bed 10 . . . has five air chambers 10a, 10b, 10c, 10d and 10e each composed of an air-impermeable sheet. . . . On/off valves 11a to 11e are arranged on outer surfaces of the air chambers 10a to 10e, respectively. The on/off valves 11a to 11e are in gas communication with an air pump 13 through an air tube 12. The air pump 13 supplies compressed air to the air chambers 10a to 10e through the on/off valves 11a to 11e." The air tube 12 system essentially traverses the length of the mattress from the single fluid source. Suzuki et al. fail to disclose (a) a first set of air tubes extending from a first dispersion unit wherein the first set of air tubes and the first dispersion unit are positioned exclusively in the section of the mattress not having the control system, (b) the second set of air tubes extend from a second dispersion unit wherein the second set of air tubes and the second dispersion unit are positioned exclusively in the section of the mattress having the control system, (c) the control system transmits electrical signals to each dispersion unit to control the operation of each dispersion unit, (d) the mattress is a conversion mattress, and (e) a self-contained mattress system, as claimed.

Suzuki et al. and Tappel fail to disclose, teach, or suggest any semblance of a self-contained, convertible mattress. Moreover, the examiner is unable to find any reference that

discloses, suggests, or teaches a conversion mattress being self-contained as claimed.

In view of this response and amendment, it is respectfully submitted that the instant application is now in condition for allowance and that such allowance is earnestly requested.